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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
DIVISION

MAURIE CAMPBELL #509442

(Enter above the full name of the
Plaintiff(s) in this action. Include prison
registration number(s).)

v.

TRACEY MITCHEM, PAULA PHILLIPS,
WILLIAM B. STANGE, IAN WALLACE,
GEORGE A. LOMBARDI,

(Enter above the full name of ALL Defendant(s) in this action. Fed. R. Civ. P. 10(a) requires that the caption of the complaint include the names of all the parties. Merely listing one party and "et al." is insufficient. Please attach additional sheets if necessary.)

Case No. _____

(To be assigned by Clerk)

(Jury Trial Demanded)

PRISONER CIVIL RIGHTS COMPLAINT UNDER 42 U.S.C. § 1983

I. PLACE OF PRESENT CONFINEMENT:

Southeastern Correctional Center, 300 E. Pedro Simmons Dr. Charleston, Mo. 63834

II. PREVIOUS CIVIL ACTIONS:

- A. Have you brought any other civil actions in state or federal court dealing with the same facts involved in this action or otherwise relating to your confinement?

YES

☒

NO

☐

B. If your answer to "A" is YES, describe the action(s) in the space below. If there is more than one action, you must describe the additional action(s) on a separate piece of paper, using the same format as below.

1. Parties to previous civil action:

Plaintiff(s): Maurice Campbell

Defendant(s): Bernard Becton Attorney

2. Court where filed: Circuit Court of St. Louis County, Mo. 21st Judicial Circuit

3. Docket or case number: 02CC-002729

4. Name of Judge: Honorable Barbara W. Wallace

5. Basic claim made: Negligence and Legal Malpractice

6. Present disposition (Is the case still pending? Is it closed? If closed, was it appealed?):

Without prejudice, Yes, No

III. GRIEVANCE PROCEDURES:

A. Is there a prisoner grievance procedure at the institution in which you are incarcerated?

YES [☒] NO [☐]

B. Have you presented this grievance system the facts which are at issue in this complaint?

YES [☒] NO [☐]

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1. Parties to previous Civil Actions:

Plaintiffs(s): Maurice Campbell.Defendants(s): Larry Rowley, Superintendent, Northeast Correctional Center; Kathleen M. Mertz, Caseworker; Kimberly L. Weatherford-Williams, Caseworker; Steve Long, Zone Director; Clay Hyde, MAPPS, Administrator; Douglas Pruden, Assoc. Supt; Michelle Thompson, Caseworker Asst; Lisa Ince, Co. II; Susan Embree, Caseworker

2. Court wherein filed:

U.S. District Court, Eastern District of Missouri;

3. Docket number or case number:

2:12-cv-00021-JCH.

4. Name of Judge to whom case was assigned:

Honorable Jean C. Hamilton.

5. Basic Claim made:

Fourth, Fifth, Sixth, Eighth, Fourteenth amended violations.

6. Present Disposition (was the case dismissed? Was it appealed?

Is it still pending?)

Without Prejudice, Yes, No

7. Date filed:

3-21-03

8. Date of Disposition:

12-13-04

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1. Parties to previous Civil Action(s):
Plaintiff(s): Maurice Campbell
Defendant(s): Mike Kemna, Superintendent, Crossroads Correctional Center
2. Court wherein filed:
U.S. District Court, Eastern District of Missouri.
3. Docket number or case number:
4:99 CV 1475-MLM
4. Name of Judge to whom case was assigned:
Honorable, Mary Ann L. Medler.
5. Basic claim made:
For relief assistance of appellate counsel, Trial Court error and abuse of discretion.
6. Present disposition (was the case dismissed? was it appealed? Is it still pending?): -
Yes, Yes, No
7. Date filed: 9-20-99 8. Date of Disposition 7-1-02

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to Parties to previous civil actions):

Plaintiff(s): Maurice Campbell.

Defendant(s): Bryan Hesters, Co.; Gillman, Co.; Buhay, Classification Caseworker Assist; Clinton, Co. Sergeant; Green, Co. Sergeant; Miller Co.; Moore Classification Caseworker; T. Blisset, Co. II, Sergeant; Carol L. Clark, Assoc. Superintendent; Steve Domingue, Classification Caseworker Assist; C. Dondy, Classification Caseworker, Acting Function Unit Manager; Keith Mays, Function Unit Manager, #40428153529; D. Horn, Classification Caseworker Assist., #4315; #44076; Dale Hansen Co. III, Lieutenant; James C. Phillips, Associate Superintendent; James L. Smith, John D. Smith, Michael Phillips, Lieutenant; Mark L. Smith, Classification Caseworker, #44076, Co. II, Classification Caseworker; Deanna Peters, Classification Caseworker Assistant, Investigating Staff; Troy Steele, Superintendent; Laura L. Vance, Associate Superintendent, Acting Superintendent; George A. Lombardi Director Division of Adult Institutions; R. Dale Riley, Director Division of Classification & Treatment;

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Randee Kaiser, Director Division of Offender Rehabilitative Services; William F. Potter, Director Division of Offender Rehabilitative Services; Terry W. Moore, Director Division of Adult Institutions; Steve Long, Assistant Director, Division of Adult Institutions;

2. Court wherein filed:

U.S. District Court, Eastern District of Missouri

3. Docket number or Caseworker:

1:06-CV-00181-TCM

4. Name of Judge to whom case was assigned:

Honorable, TCM

5. Basic Claim made:

Unconstitutional Policy, Procedures, Practices, Rules and Sanctions

6. Present Disposition (was the case dismissed? Was it appealed?

Is it still pending?):

Yes, No, Yes

7. Date filed: Date of Disposition

12-6-06

3-5-07

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1. Parties to previous Civil actions:

Plaintiff(s): Maurice Campbell.

Defendant(s) Christy Clinton (Classification Caseworker assistant),
C. Dowdy (Acting functional unit manager), Laura
Vance (Superintendent/Section head), Steve Long
(assistant director), Troy Steele (Superintendent)
and Steve Domingue (acting associate superintendent).

2. Court wherein filed:

U.S. District Court, Eastern District of Missouri

3. Docket number or Case number:

1107-CV-21-TCM

4. Name of Judge to whom case was assigned:

Honorable Thomas C. Mumment, III

5. Basic Claim made:

Concise & Unusual Punishment

6. Present disposition (was the case dismissed? was it
appealed?

Is it still pending?);

No, No, Yes

7. Date filed:

3-22-07

8. Date of disposition

5-31-07

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1. Parties to previous civil action(s):

Plaintiff(s) Maurice Campbell

Defendant(s): Travis Wilhite (Correctional Officer), M. Jackson (Correctional Officer), Donald Trapp (Correctional Officer), Richard Adams (Correctional Officer), C. Dowdy (Classification Caseworker), Christy Clinton (Classification Caseworker), Dickerson (Classification Caseworker), Keith Mays (Functional Unit Manager), P. Phillips (Acting Associate Superintendent), Laura Vance (Associate Superintendent) and Steve Long (Assistant Director)

2. Court wherein filed:

U.S. District Court, Eastern District of Missouri

3. Docket number or case number:

1:07cv18TCM

4. Name of Judge to whom case was assigned:

Honorable, Catherine D. Perry

5. Basic Claim Made:

Sexual harassment, Cruel/Unusual Punishment, Assault, Due-Process, torture, neglect, illegal restraint

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6. Recent Disposition (was the case dismissed? Was it
appealed?)

Is it still pending?)

No, No, Yes

7. Date Filed:

2-2-07

8. Date of disposition:

Pending

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1. Parties to Previous Civil Actions:

Plaintiff(s): Maurice Campbell

Defendant(s) Donald Trapp (Correctional Officer-I), Clubb, (Correctional Officer-I) #106175, Christy Clinton (Classification Caseworker), Keith Mays (Function Unit Manager), James C. Phillips (Function Unit Manager), Omar L. Clark (Acting Associate Superintendent), Steve Long (Director)

2. Court wherein filed:

U.S. District Court, Eastern District of Missouri

3. Docket number or case number:

1:07-cv-0064 RWS.

4. Name of Judge to whom case assigned:

Honorable Rodney W. Sippel.

5. Basic Claim Made:

Deliberate Indifference, Civil Unusual Punishment, Use of Force

6. Present disposition (Was the case dismissed? Was it appealed?)

Is it still Pending?:

Yes, No, No

7. Date filed

4-26-07

8. Date of Disposition

6-13-07

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1. Parties to previous Civil Actions):

Plaintiff(s): Maurice Campbell.

Defendant(s): Food Service, Christy Clinton, Keith Mays, Omar L. Clark, Patricia Cornell, Jackson, Troy Steele

2. Court wherein filed:

U.S. District Court, Eastern District of Missouri;

3. Docket number or case number:

1:07-cv-00116 SNLJ.

4. Name of Judge to whom case was assigned:

Honorable Rodney W. Sippel to Honorable
Stephen N. Limbaugh, Jr.

5. Basic Claim made:

Food Poisoning, Food Contamination, Retaliation,
Attempted Murder, Cruel & Unusual Punishment

6. Present Disposition (was the case dismissed? was it
appealed? Is it still pending?)

No, No, Yes

7. Date filed

7-30-07

8. Date of Disposition

Pending

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1. Parties to previous Civil Action(s):

Petitioner: Maurice Campbell

Respondent: Troy Steele

2. Court wherein filed:

U.S. District Court, Eastern Dist of Missouri;

3. Docket number or Case number:

4:07-cv-01367-AGF

4. Name of Judge to whom case was assigned:

Mag Judge Audrey B. Flissig

5. Basic Claim made:

Erroneous Denial of Parole

6. Present disposition (was the case dismissed?
was it appealed? Is it still pending?)

Yes, No, No

7. Date filed:

7-30-07

8. Date of disposition

2-13-09

C. If your answer to "B" is YES, what steps did you take: Filed Internal Resolution Request, Offender Grievance, and Offender Grievance Appeal.

D. If your answer to "B" is NO, explain why you have not used the grievance system:

N/A

IV. PARTIES TO THIS ACTION:

A. Plaintiff(s)

1. Name of Plaintiff: Maurice Campbell
2. Plaintiff's address: 300 E. Pedro Simons Dr. Charleston, Ma. 63834
3. Registration number: 509442
4. Additional Plaintiff(s) and address(es): N/A

B. Defendant(s)

1. Name of Defendant: Tracey Mitchem
2. Defendant's address: (SECC) 300 E. Pedro Simons Dr. Charleston, Ma. 63834
3. Defendant's employer and job title: George A. Lombardi - Director
4. Additional Defendant(s) and address(es): Paula Phillips, William B. Stange, IAN Wallace, George A. Lombardi, (SECC) 300 E. Pedro Simons Dr. Charleston, Ma. 63834. Except Mr. Lombardi at: 2729 Plaza Dr. P.O. Box 236, JC, Ma. 65102

V. COUNSEL

A. Do you have an attorney to represent you in this action?

YES []

NO [☒]

B. If your answer to "A" is NO, have you made an effort to contact an attorney to represent you in this matter?

YES []

NO [☒]

C. If your answer to "B" is YES, state the name(s) and address(es) of the attorneys you contacted and the results of those efforts:

N/A

D. If your answer to "B" is NO, explain why you have not made such efforts:

Copies of this action will be made and mailed to multiple attorneys for pro bono request to represent.

E. Have you previously been represented by counsel in a civil action in this Court?

YES [☒]

NO []

F. If your answer to "E" is YES, state the attorney's name and address:

Ross D. McFerron - Cape Girardeau

- VI. Statement of claim (State as briefly as possible the facts of your case. Describe how each defendant is involved. You must state exactly what each defendant personally did, or failed to do, which resulted in harm to you. Include also the names of other persons involved, dates, and places. Be as specific as possible. State your claims in numbered paragraphs. You may use additional paper if necessary):

1.) Caseworker Tracey Mitchem failed to forward Informal Resolution Request, Complaint #SECC-12-88 to medical staff for resolution and instead interviewed plaintiff herself denying him medical treatment on 1/18/12. Ms. Mitchem went on to delay treatment and forward the (IRR) to her Supervisor/Function Unit Manager of housing unit #3. Ms. Paula Phillips. 2) Ms. Phillips would then sign off on the (IRR) on 1/27/12 in further delay and denial of medical treatment. Instead of remanding the (IRR) back to Caseworker Ms. Mitchem or directing her to start another (IRR) process and forward to medical staff for response to medical claim. Ms. Phillips would somehow allow the (IRR) to be forwarded to the Associate Warden/Supervisor Mr. William B. Stange. 3) On 1/31/12 Mr. Stange would then sign off on the (IRR) in further delay and denial of medical treatment. Instead of remanding the (IRR) back to Supervisor Ms. Phillips or Caseworker Ms. Mitchem to start the (IRR) process over so that

medical staff could address the medical claims, Mr. Stange would somehow allow the (GRR) to be given back to Ms. Mitchem whom would call plaintiff to sign off on the (GRR) with that copy remaining in possession of Ms. Mitchem. Ms. Mitchem would then give plaintiff a Offender Grievance in further delay of Complaint in which plaintiff would fill out and forward to the Grievance Officer. 4) Somehow the Offender Grievance would be given to the Superintendent/Section Head - Mr. Ian Wallace/Warden and he would delay and deny medical treatment signing off on the Offender Grievance on 3/5/12. Instead of remanding the Complaint back to the Caseworker Ms. Mitchem to start the process over so that medical staff could address the claims.

Plaintiff was then given notice of the Offender Grievance response by the Grievance Officer and given a Offender Grievance Appeal Form. 5.) Plaintiff returned the Offender Grievance Appeal to the Grievance Officer and further delay and denial of medical treatment was the decision without a remand back to the Caseworker Ms. Mitchem. So that the (IRR) process could start over again with medical staff addressing the claims. However, Plaintiff doesn't have the name of respondent to the Offender Grievance Appeal and is without a copy of response at present. See, Attached Informal Resolution Request- Complaint Number SECC-12-88; Offender Grievance Number SECC-12-88; Offender Grievance Appeal Number SECC-12-88; Thirteen total. Defendants actions and inactions cause plaintiff to remain in "Imminent Danger."

VII. RELIEF

State briefly and exactly what you want the Court to do for you. Do not make legal arguments. (Note: If you are a **state** prisoner and you seek from this Court relief that affects the length or duration of your imprisonment, your case **must** be filed on a § 2254 form.)

Order immediate transfer to a safe environment, grant monetary damages, order cleaning of the entire ventilation system including all cell to cell vents, plumbing, drains, ceilings, walls, and closets at (SECC), Order environmental testing and inspection of the (SECC) facility and surrounding area, Prisoner exams, Waive Filing Fees.

VIII. MONEY DAMAGES:

A) Do you claim either actual or punitive monetary damages for the acts alleged in this complaint?

YES ☒NO ☐

B) If your answer to "A" is YES, state below the amount claimed and the reason or reasons you believe you are entitled to recover such money damages:

Amount of \$250,000.00 because I've been deprived of my 'Civil Rights' to be free of cruel & unusual punishment and to be provided medical transfer/treatment to avoid ongoing suffering & pain or death.

IX. Do you claim that the wrongs alleged in the complaint are continuing to occur at the present time?

YES ☒NO ☐

Maurice Campbell

Signature of attorney or pro se Plaintiff(s)

5/09/12
Date